

EXHIBIT 3

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Attorneys for Plaintiffs;

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL CATALDO,
EMIR GOENAGA, JULIAN SANTIAGO,
HAROLD NYANJOM, KELLIE NYANJOM,
and SUSAN LYNN HARVEY, individually
and on behalf of all other similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Shawn Rabin (admitted *pro hac vice*)
Steven M. Shepard (admitted *pro hac vice*)
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Case No. 3:20-cv-04688-RS

**PLAINTIFFS' INTERROGATORIES
TO DEFENDANT GOOGLE LLC
SET SEVEN**

7. The term “Non-Google App” means mobile applications that are not operated and owned by Google or a Google affiliate (e.g., Google Maps, YouTube).

8. The term “Google App” means mobile applications that are operated and owned by Google or a Google affiliate (e.g., Google Maps, YouTube).

9. “User” means a human being residing in the United States with at least one Google account.

10. “WAA-Off Data” means data generated by a user’s use of Google Apps or Non Google Apps that employ or embed any Google service (e.g., Firebase, AdMob) while Web & App Activity (WAA) or Supplemental Web & App Activity (sWAA) was disabled (which is at times referred to as off or paused). WAA-Off Data includes any information generated by or during a user’s visit to an app, including but not limited to app installation and deletion.

GENERAL INSTRUCTIONS

1. **Time Period.** The time period for these requests is the start of the class period or January 1, 2014, whichever is earlier, through the present (and ongoing) unless stated otherwise.

2. **Responses:** When an Interrogatory asks for specific information, and the specific information requested is not known to you, such Interrogatory shall be deemed to ask you to approximate the information requested as best you can, provided that you indicate in your response that the information being provided is an approximation or is incomplete. When, after a reasonable and thorough investigation using due diligence, you are unable to answer any part of an Interrogatory because of lack of information available to you, specify in full and complete detail the type of information which you claim is not available to you and what has been done by you to locate such information. In addition, specify what knowledge or information you have concerning the unanswered portion of the Interrogatory, set forth the facts upon which such knowledge or belief is based, and identify the person or entity who is likely to have the information which you claim is not available.

1 YOUR objection and to state in YOUR response: (1) how YOU narrowed
2 the Interrogatory; and (2) all reason(s) why YOU claim the Interrogatory
3 is overly broad.

4 5. **Privilege Log:** If any information called for by these Interrogatories is withheld
5 under a claim of privilege or is not responded to for whatever reason, you are requested at the
6 time of responding to these Interrogatories to separately state in writing and with specificity for
7 any such information withheld (a) the claim of privilege or other reason asserted for withholding
8 such information; and (b) all information supporting the claim of privilege or other reason for
9 withholding asserted as to such information, including, without limitation, the type or nature of
10 the response for which a privilege is claimed, all in a manner sufficient to allow each response to
11 be described to the Court in order for the Court to rule on the validity of the claim of privilege or
12 other reason asserted for withholding your response. You are further requested to provide all
13 requested information that is not subject to a claim of privilege or other reasons for nonresponse
14 by excising or otherwise protecting the portion of such response for which a privilege is asserted
15 and responding to the remainder of the interrogatory.

16 6. **Continuing Obligation:** These interrogatories are to be considered continuing in
17 nature, and YOU must promptly furnish supplemental responses if any additional information is
18 discovered or created after YOUR responses are tendered, or if any of YOUR responses are
19 subsequently determined to be incorrect, incomplete, or misleading in any respect.

20 INTERROGATORIES

21 INTERROGATORY NO. 18:

22 If Google's Responses to Requests for Admission No. 23 and No. 24 are anything but
23 unqualified admissions, please explain how a User can (or at any time during the Class Period
24 could) prevent Google from receiving and/or saving WAA-Off Data.

25 INTERROGATORY NO. 19:

26 If Google's Responses to Request for Admission No. 32 or No. 35 are anything but
27 unqualified admissions, please identify any and all non-Google sources and disclosures that, in
28 Google's view, explicitly informed or informs Users that Google saves WAA-Off Data. For

Google's receipt and storage of that information.

INTERROGATORY NO. 24:

If Google's Response to Request for Admission No. 33 is anything but an unqualified admission, please explain how Non-Google Apps that use any of GA for Firebase, AdMob, or Cloud Messaging would cease functioning and/or become unusable to their users if Google no longer stored WAA-off Data collected by way of GA for Firebase, AdMob, and Cloud Messaging.

INTERROGATORY NO. 25:

If Google's Response to Request for Admission No. 38 is anything but an unqualified admission, please explain how an app developer whose Non-Google App uses Google Analytics for Firebase can (or at any time during the Class Period could) prevent Google from receiving and saving WAA-Off Data (short of discontinuing use of the Google Analytics for Firebase service). Insofar as Google's response references specific tools or features, please state the applicable time period(s) when each tool or feature has been available.

Respectfully submitted,

Dated: September 30, 2022

SUSMAN GODFREY LLP

By: /s/ Steven Shepard

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